

Milbank

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March 28, 2023

BY EMAIL

Honorable Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re:

Universal Entertainment Corporation et al. v. Alexander Eiseman et. al, No. 23-cv-02250 (LGS)

Dear Judge Schofield:

We write on behalf of plaintiffs Universal Entertainment Corporation,¹ UE Resorts International, Inc., formerly known as Okada Manila International, Inc., and Tiger Resort, Leisure and Entertainment, Inc. (collectively, “Plaintiffs”) in response to the Court’s Order dated March 28, 2023 regarding sealing of the above-captioned action.

Plaintiffs’ Complaint extensively references UEC’s engagement of Defendants Zama Capital Advisors LP and Zama Capital Strategy Advisors LLC (the “Zama Defendants”) through engagement letters dated February 17, 2021 and October 28, 2021, respectively (the “Engagement Letters”). The Engagement Letters contain a broad confidentiality provision through which the parties agreed to keep the engagement of the Zama Defendants, and the nature of the services they provided UEC, confidential. Given the breadth of the Engagement Letters’ confidentiality provisions, and in an abundance of caution, Plaintiffs sought a sealing order as to the Complaint and the supporting documents filed therewith, in order to give the Zama Defendants an opportunity to request sealing.

As Plaintiffs explained in their sealing request, they do not believe the confidentiality provisions in the Engagement Letters meet the requirements under *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006) to warrant sealing. Plaintiffs accordingly request that the Court unseal the action and allow it to proceed publicly.

¹ “UEC.”

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Very truly yours,

/s/ Jed M. Schwartz
Jed M. Schwartz

cc: Rollo Baker (Quinn Emanuel)
Anil Makhijani (Quinn Emanuel)
Daniel Perry (Milbank LLP)
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